

FILED

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DAVID CREWS CLERK
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UNITED STATES DISTRICT COURT FOR
NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:15CR 102

QUIN LI and ZHANG YONGDI

18 U.S.C. § 371
18 U.S.C. § 1029(a)
18 U.S.C. § 2

The Grand Jury Charges:

COUNT ONE

On or about June 4, 2015, in the Northern District of Mississippi and elsewhere, the defendants, QUIN LI and ZHANG YONGDI, did knowingly and willfully conspire with each other and other persons, both known and unknown to the grand jury, including Dong Lin and Jixian Zhu, who are not named as defendants herein, to use one or more counterfeit access devices with intent to defraud, said use of counterfeit access devices affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a).

Manner and Means of the Conspiracy

It was part of the conspiracy that QUIN LI and ZHANG YONGDI would and did create and obtain false and fraudulent credit and debit cards wherein the account number shown on the front of the card did not match the account number listed on the magnetic stripe on the back of the card. When the fraudulent card was used, it would charge the account listed on the magnetic stripe, which account did not belong to any of the conspirators and for which none of the conspirators had authorization to use. The defendants travelled from New York to Mississippi wherein Lin and Zhu, acting in concert with the defendants LI and YONGDI, used one or more of the fraudulent credit and debit cards to purchase Amazon and Macy's gift cards from the

Lowe's Home Improvement stores in New Albany and Tupelo, Mississippi. After Lin and Zhu made the fraudulent purchases, LI and YONGDI planned to sell the gift cards and divide the profits among the conspirators.

Overt Acts

During and in furtherance of the conspiracy and in order to effect the object of the conspiracy, at least one of co-conspirators herein committed at least one of the following overt acts:

- a. On or about June 2, 2015, Zhang Yongdi rented a car from National Car Rental at Laguardia Airport in New York and used said rental car to transport the conspirators mentioned herein from New York to Mississippi for the purpose of committing the fraudulent transactions set forth herein.
- b. On or about June 4, 2015, Jixian Zhu entered the Lowe's Home Improvement store in Tupelo, Mississippi and used one or more fraudulent credit or debit cards to purchase either Amazon or Macy's gift cards, or both.
- c. On or about June 4, 2015, Dong Lin entered the Lowe's Home Improvement store in Tupelo, Mississippi and used one or more fraudulent credit or debit cards to purchase either Amazon or Macy's gift cards, or both.
- d. On or about June 4, 2015, Jixian Zhu entered the Lowe's Home Improvement store in New Albany, Mississippi and used one or more fraudulent credit or debit cards to purchase either Amazon or Macy's gift cards, or both.
- e. On or about June 4, 2015, Dong Lin entered the Lowe's Home Improvement store in New Albany, Mississippi and used one or more fraudulent credit or debit cards in an attempt

to purchase either Amazon or Macy's gift cards, or both

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

On or about June 4, 2015, in the Northern District of Mississippi and elsewhere, the defendants, QUIN LI and ZHANG YONGDI, aided and abetted Dong Lin and Jixian Zhu, not named as defendants herein, in knowingly and willfully, with intent to defraud, using one or more counterfeit access devices to purchase or attempt to purchase Amazon and Macy's gift cards from the Lowe's Home Improvement store in New Albany, Mississippi, said use of counterfeit access devices affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a) and 2.

COUNT THREE

On or about June 4, 2015, in the Northern District of Mississippi and elsewhere, the defendants, QUIN LI and ZHANG YONGDI, aided and abetted Dong Lin and Jixian Zhu, not named as defendants herein, in knowingly and willfully, with intent to defraud, using one or more counterfeit access devices to purchase or attempt to purchase Amazon and Macy's gift cards from the Lowe's Home Improvement store in Tupelo, Mississippi, said use of counterfeit access devices affecting interstate commerce, in violation of Title 18, United States Code, Sections 1029(a) and 2.

A TRUE BILL:

/s/ Signature Redacted
FOR PERSON



UNITED STATES ATTORNEY